



Continental Automotive Systems,  
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Federal Communications Commission  
Washington, D.C. 20554

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Date	Your request from	Our reference	Your reference
2011-07-15			

**To Whom it May Concern:**

**Comment submitted in response to the NOTICE OF PROPOSED RULE MAKING (Adopted: May 24, 2011 Released: May 25, 2011) In the Matter of Amendment of Sections 15.35 and 15.253 of the Commission's Rules Regarding Operation of Radar Systems in the 76-77 GHz Band (ET Docket No. 11-90, RM-11555) and Amendment of Section 15.253 of the Commission's Rules to Permit Fixed Use of Radar in the 76-77 GHz Band (ET Docket No. 10-28)**

Pursuant to Section 1.405 of the Federal Communications Commission's (FCC's) Rules,<sup>1</sup> Continental Automotive Systems US, Inc. with offices in One Continental Drive, Auburn Hills, Michigan 48326, United States, in conjunction with Automotive Distance Control Systems GmbH (ADC), Peter-Dornier-Strasse 10, 88131 Lindau, Germany, hereby submits comments in response to the *Notice of Proposed Rule Making* (NPRM) issued by the Commission in the above-captioned proceeding.

- 1.) Continental fully supports the inputs submitted by Toyota Motor Corporation (TMC) and welcomes the Commission's proposal to skip the distinction in FCC part 15.253 between "vehicle-in-motion" and "vehicle-not-in-motion mode". We also welcome the Commission's proposal for a general limit of the power density corresponding to 50dBm e.i.r.p. (average) and 55dBm e.i.r.p. (peak). This harmonization with the

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<sup>1</sup> 47 C.F.R. §1.405.  
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European Standard EN 301 091 and the Japanese Standard ARIB STD-T48 2.1 版 is highly welcome, as standardization and harmonization reduces development and system cost and allows safety features to find its way into mid- and lower-segment cars. As set forth below, we support the Commission's proposals in the NPRM with respect to vehicular radar systems.

- 2.) However, Continental opposes the Commission's proposal to generally allow fixed radar installations regardless of location pending a thorough analysis of the potential for electromagnetic interference from these systems to vehicular radar. TMC urges the Commission to separate these proposals and approve the changes for vehicular radar but defer action on allowing unlicensed fixed systems in this frequency band as the interference from road-side applications to automotive safety systems in vehicles has not been studied in detail. Continental supports the usage of 76-77 GHz systems for applications such as proposed by Era, but we request for countermeasures that limit the illumination of public roads by these kind of fixed applications (as already proposed by Era in the above mentioned NPRM)

Respectfully submitted,

Dean McConnell

Director, Passive Safety and ADAS, North America